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10 *Attorneys for Defendant Stratton Restoration, LLC*

11 **IN THE UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 CHERYL GAFFNER,

14 Plaintiff,

15 vs.

16 STRATTON RESTORATION, LLC,

17 Defendant.
18
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CV-15-02166-PHX-JAT

**STIPULATION FOR EXTENSION OF
TIME OF DISCOVERY DEADLINES
(FIRST REQUEST)**

20 The Parties, by and through undersigned counsel, hereby stipulate to an extension of
21 time for the discovery deadlines detailed below. The Parties stipulate that they are
22 requesting this stipulation pursuant to Civil Local Rule 7.3. An extension of case
23 management deadlines is necessary in this case where, Defendant has acquired new
24 counsel and extra time is needed to complete discovery in this case. The Parties request
25 that the Court grant an extension of time on the following deadlines:
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27
28

1 **1. Disclosure of expert testimony under Rule 26(a)(2)(C) of the Federal Rules of**
2 **Civil Procedure:**

3 Plaintiff: Move deadline to March 27, 2017

4 Defense: Move disclosure deadline to April 27, 2017

5 Plaintiff's Rebuttal expert disclosure, if any: Move disclosure deadline to
6 May 26, 2017

7
8 2. **Mediation Deadline.** The Parties request that the deadline to complete mediation
9 be moved until March 28, 2017.

10 3. **Discovery Deadline.** The Parties request to move the deadline to August 28,
11 2017.

12 4. **Filing dispositive motions:** The Parties request to move the deadline for filing
13 dispositive motions to October 20, 2017.

14 5. **Date Parties expect to be ready for trial.** The Parties request that the estimated
15 date the Parties expect to be ready for trial be moved until February 1, 2018.

16 **(See Proposed Order attached hereto.)**

17 **RESPECTFULLY SUBMITTED** this 30th day of January, 2017.

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21 **EVANS, DOVE & NELSON, P.L.C.**

22 By: /s/ H. Lee Dove

23 H. Lee Dove

24 Douglas N. Nelson

25 Attorneys for Defendant Stratton Restoration, LLC

26 **COMMUNITY LEGAL SERVICES**

27 /S/Amanda M. Caldwell

28 Amanda M. Caldwell

 Nina Targovnik

 Pamela M. Bridge

 Attorneys for Plaintiff Cheryl Gaffner

CERTIFICATE OF SERVICE

I hereby certify that I electronically transmitted the attached document to the Clerk's Office using the CM/ECF system for filing and transmittal of a Notice of Electronic Filing to the following CM/ECF Registrants this 30th day of January, 2017 and mailed a copy of the same to the following if non-registrants:

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/S/Ann M. Mance

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9 **IN THE UNITED STATES DISTRICT COURT**
10 **FOR THE DISTRICT OF ARIZONA**
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12 CHERYL GAFFNER,
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14 Plaintiff,

15 vs.

16 STRATTON RESTORATION, LLC,
17

18 Defendant.
19

CV-15-02166-PHX-JAT

[PROPOSED] ORDER

20 This matter having come before the Court upon stipulation by the parties for an
21 enlargement of time for the following case management deadlines:
22

23 **1. Disclosure of expert testimony under Rule 26(a)(2)(C) of the Federal Rules of**
24

25 **Civil Procedure:**

26 Plaintiff: Move deadline to March 27, 2017

27 Defense: Move disclosure deadline to April 27, 2017
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1 Plaintiff's Rebuttal expert disclosure, if any: Move disclosure
2 deadline to May 26, 2017

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5 be moved until March 28, 2017.

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9 4. **Filing dispositive motions:** The Parties request to move the deadline for filing
10 dispositive motions to October 20, 2017.

11 **Date Parties expect to be ready for trial.** The Parties request that the estimated
12 date the Parties expect to be ready for trial be moved until February 1, 2018.

13
14 This Court having reviewed the file herein, noting the stipulation of counsel hereto, and
15 being otherwise duly advised, it is hereby ordered that the enlargement of time of the
16 aforementioned deadlines is Granted.
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20 Dated _____

James A. Teilborg
Senior United States District Judge